

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankruptcy No. 15-21404 CMB
Harry Pearsol and)
Sylvia Pearsol,) Chapter 13
Debtors,)
U.S. Bank National Associates, as Indenture) Related to Claim No. 4
Trustee for the CIM Trust)
) Document No.
Movant,)
vs.)
Harry Pearsol, Sylvia Pearsol, and)
Ronda J. Winnecour, Chapter 13 Trustee,)
Respondents.)

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

AND NOW, come the Debtors by and through their attorneys, CALAIARO VALENCIK and David Z. Valencik, and presents the following:

1. This case was originally filed on April 23, 2015.
2. U.S. Bank, N.A. filed a Notice of Mortgage Payment Change on February 18, 2019, because of an escrow account payment adjustment.
3. The Debtors plan is overfunded.
4. The Chapter 13 has begun the process to administratively close the case.
5. There is no reason to amend Debtors' Chapter 13 Plan as the current plan is sufficient to fund the plan with the modified debt.

Respectfully submitted,

DATED: March 11, 2019

BY: /s/ David Z. Valencik
Donald R. Calaiaro, Esquire, PA I.D. #27538
dcalaiaro@c-vlaw.com
David Z. Valencik, Esquire, PA I.D. #308361
dvalencik@c-vlaw.com
CALAIARO VALENCIK
428 Forbes Avenue, Suite 900
Pittsburgh, PA 15219-1621
(412) 232-0930

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankruptcy No. 15-21404 CMB
Harry Pearsol and)
Sylvia Pearsol,) Chapter 13
Debtors,)
U.S. Bank National Associates, as Indenture) Related to Claim No. 4
Trustee for Springleaf Mortgage Loan Trust)
2013-1,) Document No. 40
Movant,)
vs.)
Harry Pearsol, Sylvia Pearsol, and)
Ronda J. Winnecour, Chapter 13 Trustee,)
Respondents.)

**CERTIFICATE OF SERVICE OF Declaration that the
Existing Chapter 13 Plan is Sufficient**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on March 8, 2019.

Service by First Class Mail:

Mr. Harry Pearsol, P.O. Box 86, 423 First Street, West Elizabeth, PA 15088

Ashley Fogle, RAS Crane, LLP, 10700 Abbott's Bridge Road, Suite 170, Duluth, GA 30097
afogle@rascrane.com

Service by NEF:

Office of the U.S. Trustee, 1001 Liberty Avenue, Suite #970, Liberty Center, Pittsburgh, PA 15222

Ronda J. Winnecour, Chapter 13 Trustee receives service electronically through the CM/ECF System at
cmecf@chapter13trusteedpa.com (Service by Electronic Notification)

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: First-Class Mail and Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: March 8, 2019

/s/ David Z. Valencik
David Z. Valencik, Esquire, PA I.D. #308361
dvalencik@c-vlaw.com
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Pittsburgh, PA 15219-1621
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